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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**STIPULATED ~~[PROPOSED]~~ ORDER**  
**MODIFYING SCHEDULE FOR EXPERT**  
**DISCOVERY CUTOFF**

Judge: Hon. James Donato

1 WHEREAS, this Court's November 18, 2022 Amended Scheduling Order set a schedule  
2 for Plaintiffs' and Defendants' merits expert disclosures. Dkt. 379.

3 WHEREAS, the Amended Scheduling Order states that the merits expert discovery cut-off  
4 is March 15, 2024. Dkt. 379.

5 WHEREAS, Plaintiffs and Meta (the "Parties") have worked together in good faith to  
6 negotiate a merits expert deposition schedule that is mutually agreeable to the Parties, taking into  
7 account all experts' professional and personal obligations, consistent with paragraph 8 of the  
8 Court's Standing Order for Discovery in Civil Cases.

9 WHEREAS, the Parties have scheduled and will have completed fifteen depositions by the  
10 merits expert discovery cut-off deadline.

11 WHEREAS, the Parties have conferred and jointly propose, subject to the Court's  
12 approval, to modify this deadline to March 22, 2024 in order to allow for the completion of the  
13 remaining five depositions. This stipulated proposed modification to the schedule will not affect  
14 the April 5, 2024 deadline to file dispositive and merits *Daubert* motions or any other deadlines.

15 WHEREAS, the Parties agree that the deposition of Georgios Zervas should be scheduled  
16 for March 19, 2024, the depositions of Yael Hochberg should be scheduled for March 19, 2024  
17 and March 20, 2024, the deposition of Sarah Lamdan should be scheduled for March 21, 2024,  
18 and the deposition of Becky Yoose should be scheduled for March 22, 2024.

19 NOW, THEREFORE, IT IS STIPULATED AND AGREED SUBJECT TO THE  
20 COURT'S APPROVAL:

- 21 • The Parties agree that the following depositions will completed by March 22, 2024:  
22 Georgios Zervas, Yael Hochberg, Sarah Lamdan, and Becky Yoose.

23 **IT IS SO STIPULATED.**

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1 DATED: March 12, 2024

Respectfully submitted,

2  
3 By: /s/ Shana E. Scarlett  
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**SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of March 2024, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 14, 2024

  
\_\_\_\_\_  
JAMES DONATO  
United States District Judge